Case 1:20-cv-08379-VSB Document 8 Filed 11/04/20 Page 1 of 1



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November 2, 2020

VIA ECF

The Honorable Vernon S. Broderick United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007 APPLICATION GRANTED SO ORDERED A VERNON S. BRODERICK U.S.D.J. 11/4/2020

Re: Frankie Monegro v. Bradshaw International, Inc. Case No. 1:20-cv-8379 (VSB)

Dear Judge Broderick:

This firm was recently retained to represent defendant Bradshaw International, Inc. ("Defendant") in the above-referenced action. This letter is written pursuant to Rule 1.G. of Your Honor's Individual Rules & Practices in Civil Cases, to request an extension of Defendant's time to answer, move, or otherwise respond to the Complaint from Thursday, November 5, 2020 to Friday, December 4, 2020. Plaintiff has consented to this request.

Defendant's request is made in light of our recent retention so that Defendant may be afforded sufficient time to review, investigate, and analyze the allegations in the Complaint and determine an appropriate response. This is Defendant's first request for an extension of this deadline. No other deadlines have been scheduled in this case as of this date.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

Snell & Wilmer L.L.P.

s/ Taryn J. Gallup

Taryn J. Gallup

TJG:dr

cc: All counsel of record (by ECF)

4835-0067-7840